SFUND RECORDS CTR
2384301

INSPECTION REPORT

U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 9

TOXICS AND WASTE MANAGEMENT DIVISION

COMPLIANCE AND RESPONSE BRANCH

Purpose:	RCRA Interim Status Standards (ISS) Investigation
Facility:	Union Manufacturing Inc. 6625 West Allison Rd. Chandler, Arizona 85224
Date of Investigation:	December 1, 1982
Report Number:	R(83)E006
EPA Identification Number:	AZD088301213
EPA Investigator:	Karen O'Regan Environmental Protection Specialist Field Inspections Section
Facility Representatives:	Mark Gohlmannn Purchasing Agent (602)961-1022 Rip Renn Paint Room Supervisor
Date Report Completed:	29 DEC 1982

BACKGROUND

Union Manufacturing Inc. is located in the Pima-Chandler Industrial Park on the Gila River Indian Reservation. On November 19, 1981 Union Manufacturing notified EPA as a generator of the following hazardous wastes (Appendix 1):

F003: The spent non-halogenated solvents, xylene, acetone, ethyl actetate, ethyl benzene, ethyl ether, n-butyl alcohol, cyclohexanone, and the still bottoms from the recovery of these solvents.

F005: The spent non-halogenated solvents, methanol, toluene, methyl ethyl ketone, methyl isobutyl ketone, carbon disulfide, isobutunol, pyridine and the still bottoms from the recovery of these solvents.

F017: Paint residues or sludges from industrial painting in the mechanical and electrical products industry.

F018: Wastewater treatment sludges from industrial painting in the mechanical and electrical products industry.

On January 16, 1981 EPA hazardous waste nos. F017 and F018 were suspended temporarily from the list of hazardous wastes.

On November 18, 1980 Union Manufacturing Inc. submitted a Part A Permit Application to EPA (Appendix 2). This document lists the site activities as storage of ignitable waste in 55 gallon drums (50 tons annually), and disposal of corrosive waste in a surface impoundment (1050 pounds annually).

On July 23, 1982 a RCRA Interim Status Ground Water Monitoring Inspection was conducted at Union Manufacturing by Bill Porter, U.S. EPA Contractor (Appendix 3). This inspection report states that the surface impoundment, which was used for leach disposal of liquid chemicals used in the wash process, is inactive. The report additionally identifies the land disposal of paint stripping wastes at Union Manufacturing.

During July and August, 1982 EPA sent several letters requesting that Union Manufacturing submit evidence of compliance with RCRA closure, post-closure, and financial requirements. On August 23, Mark Gohlmann, Union Manufacturing sent a letter to EPA requesting exemption from the regulations as a "small quantity generator" (Appendix 4). On October 1, EPA sent a letter to Mr. Gohlmann, stating that the activities described in the Part A Application do not meet the provisions of a "small quantity generator" (Appendix 5).

On November 22, 1982, the investigator contacted Mr. Gohlmann, and scheduled the inspection. Prior to the inspection, the investigator received copies of Union Manufacturing's manifests and dump receipts for 1980 from the Arizona Department of Health Services (Appendix 6).

INVESTIGATON

The investigator presented her credentials, and explained the purpose of the inspection to Mr. Gohlmann.

Mr. Gohlmann described the facility operations to the investigator. He explained that tool boxes are manufactured by cutting and pressing steel to the desired size and shape. The boxes are then cleaned using a two-stage phosphatizing washer. During the cleaning process, the boxes are sprayed with a phosphatizing chemical called KOTE 52. The Product Bulletin for KOTE 52 was requested by the investigator, and received at EPA on December 14, 1982 (Appendix 7). The KOTE 52 is diluted with water as follows: two parts KOTE 52 to a hundred gallons of water. Prior to October, 1982 a phosphatizing chemical called Turcoat Hibi-Seal was used in the washer. Material Safety Data sheets for this compound are attached (Appendix 8). Mr. Gohlmann stated that the biodegradable rinsate from the wash operation is currently discharged into the sewer. Prior to January, 1981 the rinsate was piped into the on-site surface impoundment described in the Permit Application. Mr. Gohlmann was unsure when the surface impoundment became inactive. Mr. Rip Renn, Paint Room Supervisor, estimated that use of the impoundment ceased around January, 1981.

After the washing and drying process, the tool boxes are painted in the Paint room. Mr. Gohlmann stated that toluene and xylene are used to thin the uncut paint; however, waste solvent is not generated from this activity. The painting operation generates approximately 2-3 drums per month of: paint residual from water fall paint spray booths, used paint filters, and paint covered cardboard and rags. Mr. Gohlmann provided the investigator with Material Safety Data Sheets for the paints used at Union Manufacturing (Appendix 9).

Mr. Gohlmann described the paint stripping operation to the investigator. He explained that tool boxes with defective paint jobs are immersed in a 330 gallon metal tank containing a formula called Westerns-Epoxy-Stripper. The Product Hazard Data sheets indicate that this compound is a mixture of chlorinated solvents (60% methylene chloride), phenolics, acid activators, and surfactants (Appendix 10). Prior to August 1, 1982 a caustic alkalai heat stripper called Q/M #1 was used in this process. After being immersed in the stripping tank, the boxes are dipped in a

drum containing ethylene glycol and a caustic chemical. The solids from the stripping process settle on a screen located at the bottom of the tank. Mr. Gohlmann stated that a maximum of one drum every two months of paint stripping sludge is generated from this activity.

Mr. Gohlmann provided the investigator with a copy of Union Manufacturing's manifest no. 001 (Appendix 11). This manifest states that 36 drums of flammable paint sludge was picked up by SouthWest Solvents on December 1, 1982 for transport to BKK, California. Mr. Gohlmann stated that these drums of waste accumulated on-site since October, 1980.

Following the office interview, the investigator, accompanied by Mr. Gohlmann, observed the site operations. The investigator observed the Phosphatizing Washer (Photograph 1), and the Paint Shop (Photograph 2).

The investigator observed the inactive surface impoundment located near the western property line (Photographs 3-4). Mr. Renn, Paint Shop Supervisor, stated that this impoundment is actually a concrete-lined precipitating tank. Prior to the installation of a new washer in January, 1981; washer rinsate was piped into this leach tank from the building. Mr. Renn stated that chromium, which was used in the old wash process, was removed prior to discharge by adding acids. Mr. Renn stated that the depth of the tank is approximately eight feet, and provided estimates of the tank's dimensions to the investigator. The investigator noted the approximate location of the impoundment (Area B) on a copy of the facility diagram (Appendix 12). Mr. Renn stated that when the impoundment was deactivated, the solids were removed and placed into drums. The tank was then filled in with dirt. Mr. Renn indicated that the solid waste may have been included in the December 1, 1982 waste shipment (See Appendix 11).

The investigator observed an accumulation of paint waste on the soil, below a loading dock in the Paint Storage Room (Photographs 5, 6). Mr. Renn stated that when drums of paint caught on fire, they were thrown off the dock onto the ground. This disposal site is identified as Area D on Appendix 12.

The investigator observed the covered paint stripping tank, located on a concrete pad south of the production building (Photograph 7). The investigator observed the paint stripping sludge disposal area adjacent to the southern and eastern sides of the concrete pad (Photographs 8, 9). Mr. Renn estimated that the land disposal of paint stripping sludge ceased in April, 1981. Approximate dimensions of this disposal site (Area A) are noted on Appendix 12. The investigator observed a pipe, which extends from Area A to a

potentially contaminated area approximately 30-40 feet south (Photograph 10). This pipe is used to drain excess water from the paint stripping sludge disposal area. Dark stains and an accumulation of sludge were observed in this second waste area, especially near the discharge point (Photographs 11-14). A large pool of water was observed in this area (Photograph 12). This wastewater disposal site is identified as Area B in Appendix 12.

Four open drums of sludge were observed on pallets, adjacent to the Paint stripping tank (Photographs 15, 16). Mr. Renn stated that Union Manufacturing has been slowly removing paint stripping waste from the ground, and placing it into the drums. In the future, Mr. Renn plans to reclaim the methylene chloride in the stripping compound by settling the solids in open drums, and skimming the solvent from the surface.

The investigator observed the hazardous waste storage area, which is located approximately 100 feet from the facility parking lot (See Appendix 12). Since the facility is unfenced, all waste management areas are open, and accessible via an unpaved road. The investigator observed 5 drums of waste, which SouthWest Solvents had not accepted in the December 1, 1982 shipment (Photograph 17). According to Mr. Ben Fisler, SouthWest Solvents, these drums were not accepted because Union Manufacturing Inc. was unable to identify the contents.

The investigator observed that one of the drums was open and badly dented, and another drum had an unsecured lid (Photograph 18). Several drums were in poor condition, and the pallets upon which they rested were damaged (Photographs 19, 20). Mr. Gohlmann, who was unable to identify the contents of the drums, stated that the containers are probably labeled incorrectly.

In a follow-up conversation on December 16 with Mr. Koliambas, Controller, Union Manufacturing, the investigator determined that Model Industries purchased Union Manufacturing from Triangle corporation on January 1, 1981.

The investigator completed the attached checklist to determine the facility's compliance with the regulations. Following the checklist are photographs of the facility taken by Karen O'Regan on December 1, 1982.

LIST OF APPENDICES

Checklist

Photographs

1. Notification of Hazardous Waste Activity: received August 8, 1980.

2. Hazardous Waste Permit Application: received November 19, 1980.

3. RCRA Interim Status Ground Water Monitoring Inspection Report, prepared by Bill Porter, U.S. EPA Contractor: July 23, 1982.

4. Letter from Mark Gohlmann, Union Manufacturing to EPA: August 23, 1982.

5. Letter from William Wilson, EPA to Mark Gohlmann, Union Manufacturing: October 1, 1982.

6. Hazardous Waste Manifests and Dump Receipts for Union Manufacturing for 1980: received from AZDOHS on November 22, 1982.

7. KOTE 52 Product Bulletin: received at EPA December 15, 1982.

8. Material Safety Data Sheet for Turcoat Hibi-seal.

9. Material Safety Data Sheets for paints used at Union Manufacturing.

10. Product Hazard Data Sheet for Westerns-Epoxy-Stripper.

11. Uniform Hazardous Waste Manifest No. 0001: December 1, 1982.

12. Facility Diagram with approximate locations of waste areas prepared by Karen O'Regan.

STATE IDENTIFICATION NUMBER
(If Applicable)

AZD088301215
EPA IDENTIFICATION NUMBER
(265.11)

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Union Manufacturing Inc.

(B) Street: 6625 W Allison Rd *

(C) City: Chandler (D) State: Arizona (E) Zip Code: 85224

(F) Phone: (602) 961-1022 (G) County: Maricopa

See next page for facility contact. Subsidiary of Model Indus

(H) Operator: Union Mfg. owned by Advertising Metal Display (AMD) Corp.

(I) Street: Route 47 at Cannonball Trail

(J) City: Yorkville (K) State: Illinois (L) Zip Code 60560

(M) Phone: (312) 553-6601 (N) County:

Master Lease with Lone Butte Dev. Corp. Chandler AZ.

(O) Owner: E.L. Jones Construction Co. owns Buildings

(P) Street: 5734 No 7th St.

(Q) City: Phoenix (R) State: Arizona (S) Zip Code:

(T) Phone: (602) 264-9476 (U) County: Maricopa

(V) Date of Inspection: Dec 1, 1982 (W) Time of Inspection (From) 9:00A (To) 3:30P

(X) Weather Conditions: Cloudy, Windy @ 60-65°

* Located on the Gila River Indian Reservation (Federal Land)

	Person(s) Interviewed	Title	Telephone
(Y)	Mark Lochmann	Purchasing Agent	(612) 961-1022
	Rip Renn	Paint Room Supv.	

	Inspection Participants	Agency/Title	Telephone
(Z)			

(AA) Preparer Information

Name	Agency/Title	Telephone
Karen O'Regan	EPA/Env. Prot. Spec.	(415) 974-8377

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

See Narrative

/ A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K) - Inactive
   4. Waste Piles (L)

/ B. {On-site Disposal of Waste
{Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

REMARKS

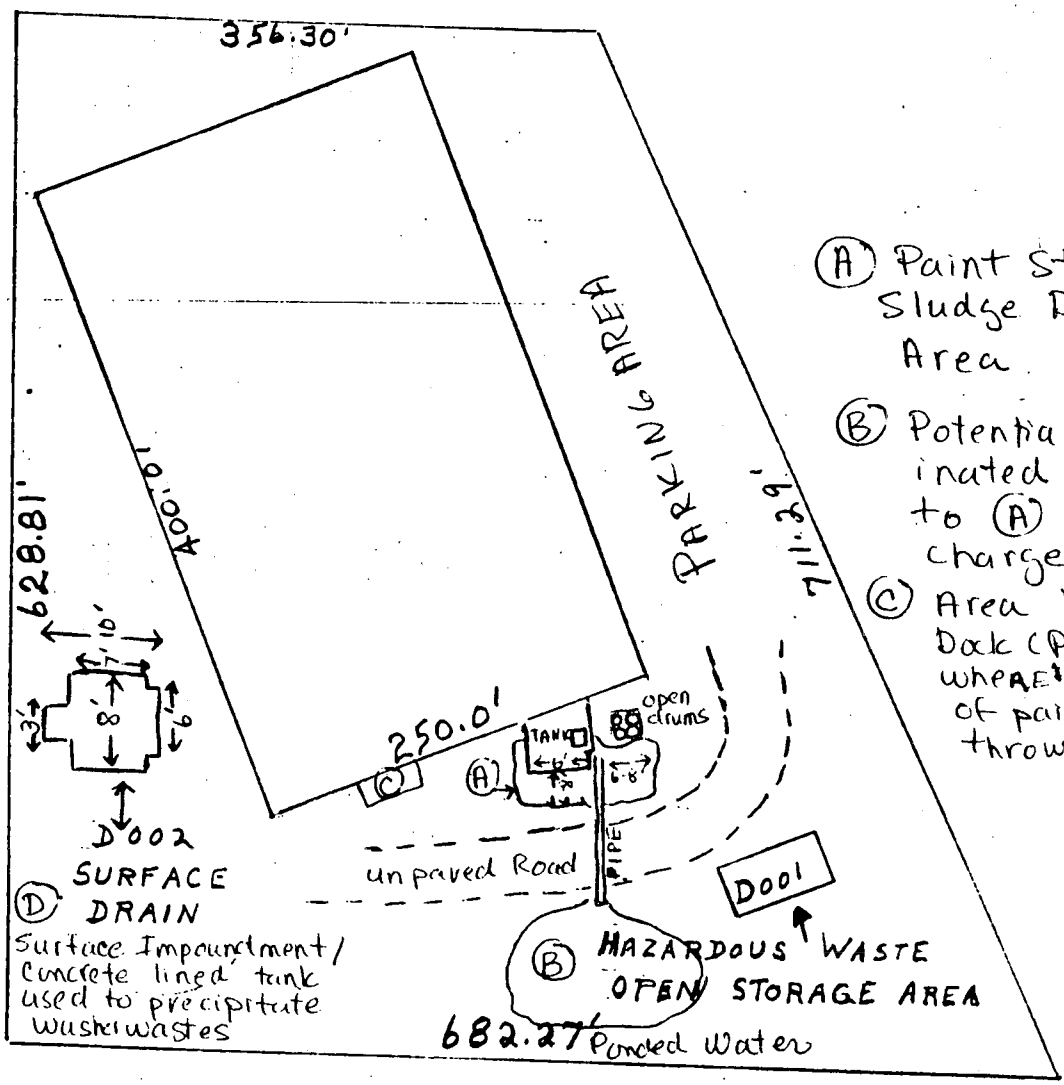
Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

See Narrative

AZD088301273

FACILITY LOCATED ON THE GILA RIVER INDIAN RESERVATION INDUSTRIAL PARK. PRIMARILY SURROUNDED BY DESERT WITH SOME AGRICULTURE. AREA-FLAT.

Investigator has added waste areas (A), (B), (C), (D) to facility diagram per Facility Representative's information.

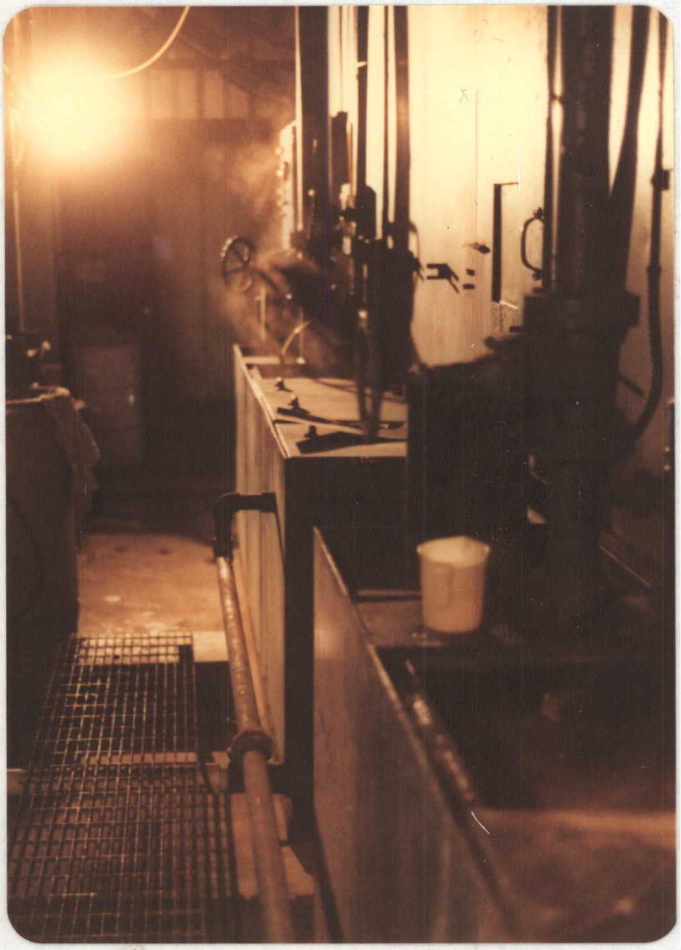


(A) Paint Stripping Sludge Disposal Area

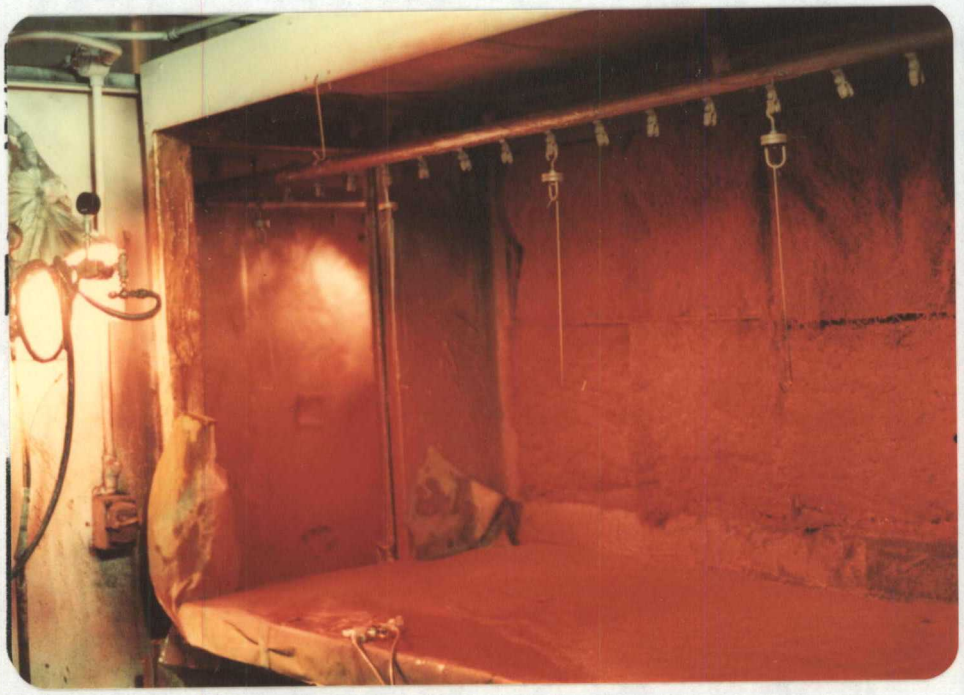
(B) Potentially Contaminated area connected to (A) via a discharge pipe.

(C) Area below loading Dock (Paint Storage) where burning drums of paint used to be thrown.

Scale - 1" = 120'



1 DATE: 12/1/82 TIME: 2:00P PHOTOG: KO
WITNESS: M. Gohlmann
DESCRIPTION: Phosphatizing Washer used to clean tool boxes. Rinsate currently is discharged to sewer.



2 DATE: 12/1/82 TIME: 2:15P PHOTOG: KO
WITNESS: M. Gohlmann, R. Ren
DESCRIPTION: Paint Booth used in the spraying of tool boxes. this activity generates paint residue, paint filters, and contaminated cardboard and rags.

3 DATE: 12 / 1 / 82 TIME: 2:25 PHOTOG: KO
WITNESS: M. Gohlmann, R. Renn
DESCRIPTION: Inactive concrete-lined tank/surface impoundment which was used to contain/precipitate wash wastes.

4 DATE: 12/ 1/82 TIME: 2:30 PHOTOG: KO
WITNESS: M. Gohlmann, R. Renn
DESCRIPTION: Washer wastes were discharged via a pipe connected from the building to the tank. The tank extended to where Mr. Renn is standing (Approx 10 ft. long).

5 DATE: 12/1/82 TIME: 2:35 P PHOTOG: ICO
WITNESS: M. Gohlmann, R. Renn
DESCRIPTION: Loading Dock in Paint Storage Area. Drums of paint on fire used to be thrown off the dock in emergencies.

6 DATE: 12/1/82 TIME: 2:37 P PHOTOG: ICO
WITNESS: M. Gohlmann, R. Renn (see above)
DESCRIPTION: Mr. Renn stated that is method of disposal ceased approx. 1½ years ago. Accumulation of paint was has covered RR tracks.

7 DATE: 12/1/82 TIME: 2:40 PPHOTOG: KO
WITNESS: M. Gohlmann, R. Renn
DESCRIPTION: 330 Gallon metal paint stripping tank containing Westerns- Epoxy-Stripper. Screen to collect solids is located at the bottom of the tank.

8 DATE: 12/1/82 TIME: 2:45PHOTOG: KO
WITNESS: M. Gohlmann, R. Renn
DESCRIPTION: Land disposal of paint stripping sludge adjacent to concrete pad in Paint Stripping Area.

9 DATE: 12/1/82 TIME: 2:47PPHOTOG: KO
WITNESS: M. Gohlmann, R. Renn
DESCRIPTION: Facing South. Disposal of paint stripping wastes extends 6-8 feet from concrete pad. Note ponded water.

10 DATE: 12/1/82 TIME: 2:50PPHOTOG: KO
WITNESS: M. Gohlmann, R. Renn
DESCRIPTION: Facing North. Note pipe which drains contaminated water from paint stripping waste disposal area.

11 DATE: 12/1/82 TIME: 3:00P PHOTOG: ICO
WITNESS: M. Gohlmann
DESCRIPTION: Waste disposal area connected to the Paint stripping sludge disposal area (Photos 8-10) via a pipe. Arrow shows discharge point.

12 DATE: 12/1/82 TIME: 3:05 P PHOTOG: ICO
WITNESS: M. Gohlmann
DESCRIPTION: See above description. Facing South. Note dark stains and accumulation of sludge. Note ponded water in area.

13 DATE: 12/1/82 TIME: 3:10 PHOTOG: KO
WITNESS: M. Gohlmann
DESCRIPTION: Facing East. Hazardous Waste storage area is located behind bushes near sludge/wastewater disposal area (See Arrow)

14 DATE: 12/1/82 TIME: 3:12P PHOTOG: KO
WITNESS: M. Gohlmann.
DESCRIPTION: Facing West. See descriptions for photos # 11, 12.

15 DATE: 12/1/82 TIME: 2:55 PHOTOG: KO
WITNESS: M. Gohlmann, R. Renn
DESCRIPTION: Facing East. Four open drums of paint stripping waste located in paint stripping area.

16 DATE: 12/1/82 TIME: 2:57 PHOTOG: KO
WITNESS: M. Gohlmann, R. Renn
DESCRIPTION: See above. Mr. Renn stated that Union Mftg. has been slowly cleaning up sludge on the ground and placing in drums

17 DATE: 12/1/82 TIME: 3:15 PHOTOG: ICO
WITNESS: M. Gohlmann
DESCRIPTION: Facing West. Hazardous Waste Storage Area (unfenced, uncovered). Note tape on white drum (2nd from right)

18 DATE: 12/1/82 TIME: 3:20 PHOTOG: ICO
WITNESS: M. Gohlmann
DESCRIPTION: From left to Right:
1) Unsecured lid on drum at left
2) Evidence of leaks on center drum
3) Open drum at right - see Photo 19.

#19 DATE: 12/1/82 TIME: 3:25 PHOTOG: KO
WITNESS: M. Gohlmann
DESCRIPTION: Badly dented, open drum containing waste. Mr. Gohlmann was unable to identify contents of any drums.

#20 DATE: 12/1/82 TIME: 3:30 PHOTOG: KO
WITNESS: M. Gohlmann
DESCRIPTION: Broken pallets used for hazardous waste storage. Note ponded water; no secondary containment.

Company Name Union Manufacturing Page ____

SUBPART G - CLOSURE AND POST CLOSURE

(265.112) CLOSURE: (effective 7/13/81)

Does the facility have a Closure Plan?	YES	NO
*** If "yes," complete:		
Description of how and when facility will be partially/ultimately closed?	YES	NO
Estimate of the maximum inventory of wastes in storage or treatment at any given time during the life of the facility.	YES	NO
Description of steps needed to decontaminate facility equipment during closure?	YES	NO
Schedule for final closure to include:		
- Anticipated date when wastes will no longer be received	YES	NO
- Date when completion of final closure is anticipated	YES	NO
- Intervening milestone dates	YES	NO

Comment: _____

M

LAND TREATMENT

Facility Name: Union Manufacturing Date of Inspection: 12/13/82

		Yes	No		
1.	Is treated hazardous waste capable of biological or chemical degradation? (265.272.a)	—	—	—	unknown/not analyzed
* 2.	Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)? (265.272b,c)	—	✓	—	
3.	Is waste analyzed according to 265.273?	—	✓	—	
* 4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	—	—	—	N/A
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? (265.278)	—	✓	—	
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	—	✓	—	
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? (265.279)	—	✓	—	
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) (265.281)	—	—	—	unknown
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) (265.282)	—	—	—	unknown

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill? (265.302.a)	___	___	___	_____
**2. Collection of run-off from active portions of the fill? (265.302.b)	___	___	___	_____
**3. Is collected run off treated? (265.302.c)	___	___	___	_____
4. Control of wind dispersal of hazardous waste? (265.302.d)	___	___	___	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell? (265.309.b)	___	___	___	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell? (265.309.b)	___	___	___	_____
(C) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive? (265.312)	___	___	___	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(D) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells? (215.313)	___	___	___	_____
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(E) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
*2. Does the landfill have a chemically and physically resistant liner system? (265.314)	___	___	___	_____
3. Does the landfill have a functional leachate collection system? (265.314)	___	___	___	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill? (265.314)	___	___	___	_____
(F) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? (265.315)	___	___	___	_____

*Not Inspected

O and P
INCINERATION and THERMAL TREATMENT 340-351*

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.	_____	___	___	___	_____
2.	_____	___	___	___	_____
3.	_____	___	___	___	_____
4.	_____	___	___	___	_____
5.	_____	___	___	___	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

	1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a.	Heating value	___	___	___	_____
b.	Halogen content	___	___	___	_____
c.	Sulfur content	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

B. List other parameters for which the waste is tested to enable owner or operator to establ steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
B. Is steady state maintained or corrections attempted?	___	___	___	_____
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected
**Specify in Remarks for what period of time this was checked.

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes? (265.405)	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) (265.406)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review? (262.22)	✓	___	___	See Appendix II
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements) (262.21)				
1. Manifest document number?	✓	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓	___	___	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	✓			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?		✓		Incomplete address for BKK; EPA ID # for BKK not listed See Appendix II
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required certification?	✓			
8. Required signatures? (262.23)	✓			
(C) Does the owner or operator submit exception reports when needed? (262.42)				NA

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site) (49 CFR 172.101) (262.30).				
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site) (49 CFR 172.101) (262.31, 262.32)				
(C) If required, are placards available to transporters of hazardous waste? (262.33)				

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date? (265.34)				
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days? (262.34)				
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? (265.176)				
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank? (265.192.b)				
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures? (265.192.c)				
c. Do continuous feed systems have a waste-feed cutoff? (265.192.d)				
d. Are required daily and weekly inspections done? (265.194)				
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements? (265.198)				
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) (265.199)				

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years? (262.40)	✓			
(B) Has the generator submitted Annual Reports and Exception Reports as required? (262.42)				

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		✓		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator: (265.12)				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years? (263.22)	—	—	—	

II. INTERNATIOINAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.? (263.22)	—	—	—	
B. Are signed completed manifest(s) on file?	—	—	—	

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad? (263.10)	—	—	—	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? (263.10)	—	—	—	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source? (265.12)				NA
(B) General Waste Analysis: (265.13)				
1. Has the owner or operator obtained a detailed chemical and physical analysis of of the waste?		✓		
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?		✓		
Does the plan contain:				
-Parameters of analysis of each waste handled?		✓		
-Rationale for the selection of each parameter?		✓		
-Test methods for each parameter?		✓		
-Sampling methods for each waste?		✓		
-Frequency which each analysis will be reviewed or repeated?		✓		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		✓		
4. If the above procedures include sampling, is the sampling method described?		✓		
(C) Security - Do security measures include: (if applicable) (265.14)				Note: The Pima-Chandler Industrial Park is patrolled by the Gila River Security Police.
1. 24-Hour surveillance?		✓		
2. Artificial or natural barrier around facility?		✓		Facility is fenced
3. Controlled entry?		✓		
4. Danger sign(s) at entrance?		✓		

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
(D) Do Owner or Operator Inspections Include: (265.15)				
1. Records of malfunctions?	___	✓	___	Owner/Operator has
2. Records of operator error?	___	✓	___	not developed a
3. Records of discharges?	___	✓	___	written inspection
4. Inspection schedule?	___	✓	___	schedule or log.
5. Safety, emergency equipment?	___	✓	___	Mr. Gohlmann
6. Security equipment?	___	✓	___	stated that the haz
7. Operating and structural equipment?	___	✓	___	waste storage area is
8. Inspection log?	___	✓	___	inspected once/month.
Does the inspection log include:				
-Date & time of inspection?	___	✓	___	___
-Name of inspector?	___	✓	___	___
-Observations recorded?	___	✓	___	___
-Date & nature of repairs?	___	✓	___	___
(E) Do personnel training records include: (Effective 5/19/81) (265.16)				
1. Job titles?	✓ (Utility Man)	___	___	Mr. Gohlmann was unsure who the
2. Job descriptions?	___	✓	___	"Utility Man" is who handles haz. waste
3. Description of training?	___	✓	___	Job descriptions do not include waste
4. Records of training?	___	✓	___	management practices. Mr. Gohlmann stated
5. Have facility personnel received required training by 5/19/81?	___	✓	___	that employees are trained (OTS) within
6. Do new personnel receive required training with in six months?	___	✓	___	six months, and are aware of basic waste management procedures however, this is not documented.
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed? (265.17) Have not analyzed waste to determine if it is ignitable				
1. Special handling?	see comment!	___	___	No Smoking signs
2. No smoking signs?	___	✓	___	are posted in the Paint Room but are not posted in the paint stripping
3. Separation and protection from ignition sources?	✓	___	___	area or haz waste storage area.

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

		Yes	No	NI*	Remarks
(A)	Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	✓			On-site disposal of Paint Stripping Sludge (See narrative)
(B)	If required, does the facility have the following equipment: (265.32)				
	1. Internal communications or alarm systems?	✓			Facility is equipped with telephones (within 20 ft of paint stripping area), fire alarms (4 locations), and burglar alarms on windows.
	2. Telephone or 2-way radios at the scene of operations?	✓			
	3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓	✓		Mr. Gohlman stated that the facility is equipped with fire extinguishers, however it is not equipped with the proper dry chemical to clean up the Western Epoxy stripper.

Indicate the volume of water and/or foam available for fire control:

(C)	Testing and Maintenance of Emergency Equipment: (265.33)				Safety/Emergency equipment includes: Gloves; Disposable; Ultra-Twin respirators (cartridges changed once/day); Face shields (used in stripping operation); eyewash; coats/coveralls; safety glasses (when welding). Employees are instructed in the use of the equipment by Mr. Rip Renn, Paint Shop Foreman.
	1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
	2. Is emergency equipment maintained in operable conditions?	✓			
(D)	Has owner or operator provided immediate access to internal alarms? (if needed) (265.34)	✓			

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? (265.35) ✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)		✓		
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		✓		
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators? (265.52)		✓		
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? (265.52)		✓		
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?) (265.52)		✓		

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations? (265.53)		✓		
(C) Emergency Coordinator (265.55)				
1. Is the facility Emergency Coordinator identified?		✓		
2. Is coordinator familiar with all aspects of site operation and emergency procedures?		✓		
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		✓		
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				NA

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System (265.71)				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?				NA - See Section IX
2. Are records of past shipments retained for 3 years? (262.40)				
(B) Does the owner or operator meet requirements regarding manifest discrepancies? (265.72)				

*Not Inspected

(C) Operating Record (265.73)

1.	Does the owner or operator maintain an operating record as required in 265.73?			NA
2.	Does the operating record contain the following information:			
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?			
c.	The location and quantity of each hazardous waste within the facility?			
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)			
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?			
f.	Reports detailing all incidents that required implementation of the Contingency Plan?			
g.	All closure and post closure costs as applicable? (Effective 5-19-81)			

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

K

SURFACE IMPOUNDMENTS

Facility Name: _____ Date of Inspection: _____

1.	Do surface impoundments have at least 60 cm (2 feet) of freeboard? (265.222)				
2.	Do earthen dikes have protective covers? (265.223)				
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before? (265.225)				
4.	Is the freeboard level inspected at least daily? (265.226.a.2)				
5.	Are the dikes inspected weekly for evidence of leaks or deterioration? (265.226.a.2)				
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) (265.229)				
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) (265.230)				

L

WASTE PILES

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind? (265.251)				
2. Is each in-coming movement of waste analyzed before being added to the waste pile? (265.252)				
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? (The effective date of this provision is Nov. 19, 1981.) (265.253)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) (265.256.a.1)				
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react? (265.265.a.2)				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) (265.257.a)				
7. Are piles of imcompatible waste protected by barriers or distance from other waste? (265.257.b).				

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

See Narrative

5. The following applied only to owners and operators of surface impoundments, landfills and land treatment facilities:

   a) Does the facility have available insurance coverage for claims resulting from non sudden accidental occurrences ($3 million per occurrence, $6 million annual aggregate*). (265.147b) ___ ___ ___ _____

   * Facilities with annual sales/revenue of:

   $10 million - effective January 15, 1983

   $5-10 million - effective January 15, 1984

   <$5 million - effective January 15, 1985

APPENDIX A-3

INSPECTION COMPLIANCE FORM FOR DEMONSTRATING A WAIVER OF INTERIM STATUS REQUIREMENTS

Company Name:_____; EPA I.D. Number:_____

Company Address:_____; Inspector's Name:_____

_____

_____

Company Contact:_____; Branch/Organization:_____

Title:_____; Date of Inspection:_____

	Yes	No	Unknown
1. Is a written waiver demonstration kept at the site?	____	____	
2. Is the demonstration certified by a qualified geologist or geotechnical engineer? 265.90(c)	____	____	
3. Does the waiver demonstration establish:			
a) The potential for migration of hazardous waste or hazardous waste constituents from the facility to the uppermost aquifer? 265.90(c)(1)	____	____	
b) An evaluation of a water balance including:			
1) Precipitation?	____	____	
2) Evapotranspiration?	____	____	
3) Runoff?	____	____	
4) Infiltration? (including any liquid in surface impoundments)	____	____	
c) Unsaturated zone characteristics?	____	____	
1) Geologic materials?	____	____	
2) Physical properties?	____	____	
3) Depth to ground water?	____	____	

	Yes	No	Unknown
3. If significant differences were not due to error, was a written notice sent to the Regional Administrator within 7 days of confirmation?	____	____	
4. Within 15 days of notification of the Regional Administrator was a certified ground-water quality assessment plan submitted? 265.93(d)(2)*	____	____	
a) Does the plan specify 265.93(d)(3) :			
1) well information (specifics)	____	____	
(a) number?	____	____	
(b) locations?	____	____	
(c) depths?	____	____	
2) sampling methods?	____	____	
3) analytical methods?	____	____	
4) evaluation methods?	____	____	
5) schedule of implementation?	____	____	
b) Does the plan allow for determination of 265.93(d)(4) :			
1) Rate and extent of migration of hazardous waste or hazardous waste constituents?	____	____	
2) Concentrations of the hazardous waste or hazardous waste constituents?	____	____	
c) Is it indicated that the first determination was made as soon as technically feasible? 265.93(d)(5)	____	____	
1) Within 15 days after the first determination was a written report containing the assessment of ground-water quality submitted to the Regional Administrator?		____	____
d) Was it determined that hazardous waste or hazardous waste constituents from the facility have entered the ground water?	____	____	
1) If "No", was the original indicator evaluation program, required by 265.92 and 265.93(b), reinstated?	____	____	
(a) Was the Regional Administrator notified of the reinstatement of program within 15 days of the determination? 265.93(d)(6)	____	____	

*See note Page 2-10

	Yes	No	Unknown
8. Has a ground-water sampling and analysis plan been developed? 265.92(a)	____	____	____
a) Has it been followed?	____	____	____
b) Is the plan kept at the facility?	____	____	____
c) Does the plan include procedures and techniques for:			
1) Sample collection?	____	____	
2) Sample preservation?	____	____	
3) Sample shipment?	____	____	
4) Analytical procedures?	____	____	
5) Chain of custody control?	____	____	
9. Are the required parameters in ground-water samples being tested quarterly for the first year? 265.92(b) and 265.92 (c)(1)	____	____	
a) Are the ground-water samples analyzed for the following:			
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 265.92(b)(1)	____	____	
2) Parameters establishing ground-water quality? 265.92(b)(2)	____	____	
3) Parameters used as indicators of ground-water contamination? 265.92(b)(3)	____	____	
(i) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 265.92(c)(2)	____	____	
(ii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 265.92(c)(2)	____	____	
b) For facilities which have completed first year ground-water sampling and analysis requirements:			
1) Have samples been obtained and analyzed for the ground-water quality parameters at least annually? 265.92(d)(1)	____	____	
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually? 265.92(d)(2)	____	____	

	Yes	No	Unknown
11. Have records been kept of analyses for parameters in 265.92(c) and (d)? 265.94(a)(1)	____	____	
12. Have records been kept of ground-water surface elevations taken at the time of sampling for each well? 265.94(a)(1)	____	____	
13. Have records been kept of required elevations in 265.93(b)? 265.94(a)(1)	____	____	
14. Have the following been submitted to the Regional Administrator 265.94(a)(2) :*			
a) Initial background concentrations of parameters listed in 265.92(b) within 15 days after completing each quarterly analysis required during the first year?	____	____	
b) For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?	____	____	
c) Annual reports including:			
1) Concentrations or values of parameters used as indicators of ground-water contamination for each well along with required evaluations under 265.93(b)?	____	____	
2) Any significant differences from initial background values in up-gradient wells separately identified?	____	____	
3) Results of the evaluation of ground-water surface elevations?	____	____	

*EPA will be proposing (Spring 1982) to replace this reporting requirement with an exception reporting system where reports will be submitted only where maximum contaminant levels or significant changes in the contamination indicators or other parameters are observed. EPA has delayed compliance stage for 14 a) above until August 1, 1982 (Federal Register, February 23, 1982, p.7841-7842) to be coupled with exception reporting in the interim.

Subpart F

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUND-WATER MONITORING

Company Name: _____; EPA I.D. Number: _____

Company Address: _____; Inspector's Name: _____

_____

_____

Company Contact/Official: _____; Branch/Organization: _____

Title: _____; Date of Inspection: _____

	Yes	No	Unknown	Waived
Type of facility: (check appropriately)				
a) surface impoundment	___	___		
b) landfill	___	___		
c) land treatment facility	___	___		
d) disposal waste pile* - see comment	✓	___		
Ground-Water Monitoring Program				
1. Was the ground-water monitoring program reviewed prior to site visit? If "No",	___	___		
a) Was the ground-water program reviewed at the facility prior to site inspection?	___	___		
2. Has a ground-water monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 265.90(a)	___	✓	___	___

*Listed separate from landfill for convenience of identification.

Comment: Facility has not implemented a ground-water monitoring program. Use of the surface impoundment/tank ceased in Jan., 1981. Impact of on-site disposal of paint stripping sludge on groundwater is undetermined.

Company Name _____ Page ____

Has the Closure Plan been amended? YES (NO)

Comment: _____

_____

_____

Date of Closure or anticipated date of Closure (if known) unknown

- Has owner/operator submitted Closure Plan to Regional Administrator for review 180 days prior to anticipated closure date? YES NO } NA

(265.115) If Closure completed, has certification of Closure been submitted to the Regional Administrator? YES NO

(265.118) POST-CLOSURE: (Disposal Facilities Only - effective 7/13/81) = Plan should reflect on-site waste disposal

Does the facility have a Post-Closure Plan? YES NO

*** If "yes," complete:

Description of ground water monitoring activities and frequencies? YES NO

Description of maintenance activities and frequencies to ensure:

- Integrity of cap or other containment structures? YES NO

- The function of the facility's monitoring equipment? YES NO

Has the Post-Closure plan been amended? YES NO

Comment: _____

_____

_____

_____

Has owner/operator submitted Post-Closure Plan to Regional Administrator 180 days prior to anticipated closure date? YES NO NA

Company Name _____ Page ____

(265.119) If Closure is complete:

- Has owner/operator submitted to Regional Administrator and Local Land Authority a survey plot of disposal area within 90 days of closure? YES NO

  Comment: _____

- Has owner/operator submitted to Regional Administrator and Local Land Authority a record of the type, location, and quantity of hazardous wastes disposed of within the facility? YES NO

  Comment: _____

(265.120) Has owner noted in facility property deed (or other document which is normally examined in a title search) that:

- The land has been used to manage hazardous wastes? YES NO
- Its use is restricted according to 117(c)? YES NO

H

Financial Requirements

Facility Compliance with Subpart H Financial Requirments will be monitored by the Toxics and Waste Programs Branch. All inspectors should contact Richard Procunier before conducting a field inspection to obtain the financial data necessary to evaluate facility compliance with Subpart H. It should be noted that all facilities located in unauthorized States are required to submit written evidence of financial assurance for closure/post-closure care and liability coverage for sudden accidental occurrences to EPA Region 9. Facilities located in authorized States should be submitting their financial statements to the Headquarter's Office of the State's lead agency. Nonsudden liability coverage will be required for surface impoundments, landfills and land treatment facilities beginning in January, 1983.

This checklist is provided to record Compliance Status Information.

H

FINANCIAL REQUIREMENTS

FACILITY NAME: _____ DATE OF INSPECTION: _____

	YES	NO	NI	REMARKS
A. Closure Costs and Finanical Assurance				
1. Is cost estimate for facility closure available? (265.142a) (Effective May 19, 1981)		✓		
2. Does the closure cost estimate reflect any amendments to the Closure Plan? (265.142b)		✓		
3. Has the closure cost estimate been adjusted annually using an inflation factor? (265.142c)		✓		
4. Has financial assurance been established for facility closure? (265.143)		✓		

If YES, specify the chosen mechanism(s) (trust fund, surety bond guaranteeing payment into a trust fund, letter of credit, insurance, financial test, etc.) _____

5. Has the facility satisfied the requirements for the use of the chosen financial mechanism(s)?		✓		

If NO, describe the deficiencies; (I.E., failure to execute required documents; to use exact wording in agreement as required; to make adjustments to reflect increases in closure cost estimates; to make payments to trust fund or pay insurance premiums.).

_____

FACILITY NAME: _____ DATE OF INSPECTION: _____

	YES	NO	NI	REMARKS
B. Post-closure Care Costs and Financial Assurance (Disposal Facilities Only)				
1. Is the cost estimate for post-closure monitoring & maintenance available? (265.144a) (Effective May 19, 1981)		✓		
2. Does the post-closure estimate reflect any amendment to the post-closure plan? (265.144b)		✓		
3. Has the post-closure cost estimate been adjusted annually using an inflation factor? (265.144c)		✓		
4. Has financial assurance been established for facility post-closure care? (165.145)		✓		

If YES, specify the chosen mechanism(s) (trust fund, surety bond guaranteeing payment into a trust fund, letter of credit, insurance, financial test, etc.). _____

5. Has the facility satisfied the requirements for the use of the chosen financial mechanism(s)?		✓		

If NO, describe the deficiencies; (I.E., failure to execute required documents; to use exact wording in agreement as required; to make adjustments to reflect increases in post-closure care estimates; to make payments to trust fund or pay insurance premiums.). _____

FACILITY NAME: _____ DATE OF INSPECTION: _____

	YES	NO	NI	REMARKS
C. Financial Liability				
1. Can the facility demonstrate the liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence with an aggregate of at least $2 million? (265.147a)	___	√	___	_____
2. Circle the mechanism(s) being used to demonstrate liability coverage:				
Insurance				
Financial Test				
Financial Test & Insurance				
3. Insurance:				
a) Is the insurance policy amended to contain a hazardous waste facility liability endorsement.	___	___	___	_____
Is the endorsement worded as required in Sec. 264.151 (or) Is the insurance policy evidenced by a certificate of liability insurance.	___	___	___	_____
Is the certificate worded as required in Sec. 264.151.	___	___	___	_____
b) Is the insurer of the insurance policy licensed to transact the business of insurance? (or) Is the insurer eligible to provide insurance as an excess or surplus lines insurer?	___	___	___	_____

FACILITY NAME: _____ DATE OF INSPECTION: _____

	YES	NO	NI	REMARKS
4. Financial Test:				
a) Circle the criteria that the facility is using to demonstrate that it passes the financial test:				
Alternative I				
Alternative II				
b) Does the facility meet the criteria for the chosen alternative?	___	___	___	_____
If NO, explain the defeciencie(s): _____				
c) Has the facility submitted the following three items to the Regional Aministrator				
1) A letter signed by the Chief Financial officer and worded as specified in Sec. 264.151.	___	___	___	_____
2) A copy of the C.P.A.'s report on examination of the financial statement for the latest completed fiscal year.	___	___	___	_____
3) A special report from the C.P.A. to the owner or operator stating that a comparison of the data from the letter with the amounts in the financial statement has been completed and that no inconsistences exist which would require an adjustment.	___	___	___	_____
4) Has the facility applied for a one time extension?	___	___	___	_____

STATE IDENTIFICATION NUMBER
(If Applicable)

AZD088301213
EPA IDENTIFICATION NUMBER
(265.11)

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Union Manufacturing Inc.

(B) Street: 6625 W. Allison Rd *

(C) City: Chandler (D) State: Arizona (E) Zip Code: 85224

(F) Phone: (602) 961-1022 (G) County: Maricopa

See next page for facility contact. Subsidiary of Model Indust

(H) Operator: Union Mfg owned by Advertising Metal Display (AMD) Corp

(I) Street: Route 47 at Cannonball Trail

(J) City: Yorkville (K) State: Illinois (L) Zip Code 60560

(M) Phone: (312) 553-6601 (N) County:

Master Lease with Lone Butte Dev. Corp. Chandler AZ.

(O) Owner: E.L. Jones Construction Co. owns Building

(P) Street: 5734 No. 7th St.

(Q) City: Phoenix (R) State: Arizona (S) Zip Code:

(T) Phone: (602) 264-9476 (U) County: Maricopa

(V) Date of Inspection: Dec. 1, 1982 (W) Time of Inspection (From) 9:00A (To) 3:30P

(X) Weather Conditions: Cloudy, Windy, @ 60-65°

* Located on the Gila River Indian Reservation (Federal Land)

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Mark Gachlmann	Purchasing Agent	(602) 961-1022
Rip Renn	Paint Room Supv.	

(Z) Inspection Participants	Agency/Title	Telephone

(AA) Preparer Information

Name	Agency/Title	Telephone
Karen O'Regan	EPA/Env. Prot. Spec.	(415) 974-8370

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

See Narrative

/ A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K) - Inactive
   4. Waste Piles (L)

/ B. {On-site Disposal of Waste
   Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Union Manufacturing Date of Inspection: 12/1/82

	Yes	No	NI*	Remarks
1. Are containers in good condition? (265.171)	—	✓	—	*See Photographs 15-20
2. Are containers compatible with waste in them? (265.172)	unknown			- Facility was unable to identify contents of drums
3. Are containers stored closed? (265.173a)	—	✓	—	- Open containers of waste observed in Paint stripping Area (4) and haz. waste storage area (2)
4. Are containers managed to prevent leaks? (265.173b)	—	✓	—	- The inspector observed dented and taped-up drums
5. Are containers inspected weekly for leaks and defects? (265.174)	—	✓	—	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.) (265.176)	- unknown waste			- Facility has not analyzed
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) (265.176)	unknown			
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? (265.177)	unknown			

J
TANKS

Facility Name: _____ Date of Inspection: _____

1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? (265.192.b)	___	___	___	Paint Stripping Tank is a process tank. ~~the~~ New Westerns - Epoxy-Stripper is added when the tank level is low. Mr. Gohlmann stated that the tank is not cleaned out - just the solids are removed on the screen.
2.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? (265.192.c)	___	___	___	
3.	Do continuous feed systems have a waste-feed cutoff? (265.192.d)	___	___	___	
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before? (265.193)	___	___	___	
5.	Are required daily and weekly inspections done? (265.194)	___	___	___	
*6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) (265.198)	___	___	___	
7.	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) (265.199)	___	___	___	

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? (265.198.b)

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)